



4a  
WA 2917  
5/12/1986

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4350 - 150th Ave. N.E. • Redmond, Washington 98052-5301 • (206) 885-1900

M E M O R A N D U M

May 12, 1986

FILE COPY

TO: Joan Thomas, Regional Manager, NWRO  
THROUGH: John Conroy and <sup>AC</sup>Stew <sup>Sam</sup>Messman, NWRO  
FROM: Laurence Ashley, NWRO  
SUBJECT: Recommendation for Administrative Order  
Chemical Processors, Inc.  
(Pier 91 Facility Seattle)  
5501 Airport Way South  
Seattle, Washington 98108

The United States Environmental Protection Agency (USEPA), Region 10, Oversight Inspection Report for Chemical Processors, Inc., was conducted April 9, 1985. USEPA been requested that the Department of Ecology issue proper enforcement action against this facility. (See attachment).

Chemical Processors, Inc. is in violation of WAC 173-303. Areas specifically needing attention are as follows:

- 060 The facility has been handling WT02 wastes for the past two years without notifying the department with a revised Notification Form 2 or a revised Part A application.
- 610 The facility needs to update the Closure Plan to bring the costs up to date. This is an annual requirement.
- 300 The facility needs to update the waste analysis plan. The plan should have specific ways of determining what wastes are received and the associated test protocols or quality control procedures for verification.

I am recommending that an Administrative Order be issued to Chemical Processors, Inc., Pier 91 Facility, Seattle, Washington.

LA:gm

USEPA RCRA



3012778

RECOMMENDATION FOR ENFORCEMENT ACTION

DATE: May 16, 1986

DE NO. 86-525

FROM: Laurence Ashley  
(Full Name of Investigator)

(206) 885-1900  
(Public Telephone Number)

RECOMMEND ENFORCEMENT ACTION BE TAKEN AGAINST:

I. Chemical Processors, Inc. - Pier 91 Facility  
(Name: Company, Individual, Municipality, County, etc)  
5501 Airport Way South, Seattle, WA 98108  
(Address) (Zip Code)

II. FOR:

A. Violation of Water Well Construction Act of 1971, Chapter 18.104 RCW

- \_\_\_ 1. Specific paragraph RCW/WAC \_\_\_\_\_
- \_\_\_ 2. Failure to submit a well report for a well drilled for  
     Name of Well Owner: \_\_\_\_\_  
     Address: \_\_\_\_\_  
     Permit Number: \_\_\_\_\_

\_\_\_ B. Violation of Clean Air Act, Chapter 70.94 RCW.  
Specific paragraph RCW/WAC \_\_\_\_\_

\_\_\_ C. Violation of Flood Control Laws, Chapter 86.16 RCW.  
Specific paragraph RCW/WAC \_\_\_\_\_

\_\_\_ D. Violation of Water Resources Laws, Title 90 RCW. (Reference RCW 43.27A)  
Specific paragraph RCW/WAC \_\_\_\_\_

\_\_\_ E. Unlawful Discharge of wastes into public waters, RCW 90.48.080.

\_\_\_ F. Water Quality Regulatory Notice and Order, RCW 90.48.120.  
(1) Agricultural Discharges, RCW 90.49.450.  
Has consideration been given to change of land use? \_\_\_\_\_

\_\_\_ G. Noncompliance with waste discharge permit, RCW 90.48.180 (Include a copy of page 1 and the page of the permit containing the condition violated.)

\_\_\_ H. Intentional or negligent discharge of oil into state waters, RCW 90.48.350.  
\_\_\_ (1) Unlawful discharge of oil into state waters, RCW 90.48.320

\_\_\_ I. Modification of Water Quality Criteria, WAC 173-201-100(2).

X J. Violation of Hazardous Waste Laws, Chapter 70.105 RCW Specific paragraph  
~~RCW~~WAC -060, -300, and -610

\_\_\_ K. Other \_\_\_\_\_.

Name of Company or Individual: Chemical Processors, Inc. Pier 91 Facility

III. The violation occurred at: Time: N/A Date: January 16, 1986

IV. Location of the incident/activity: \_\_\_\_\_

V. Name of watercourse involved: \_\_\_\_\_ Class: \_\_\_\_\_

VI. Narrative of incident/situation (Use separate page or memo if necessary).  
Need amended Closure Plan, Waste Analysis Plan, Revised Notification and revised Part A Application - U.S. EPA Oversight Inspection Report of April 19, 1985. (See attachments)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VII. Physical evidence obtained: Samples     Pictures     Other    

VIII. Names and addresses of witnesses:  
\_\_\_\_\_  
\_\_\_\_\_

IX. Recommended penalty OR regulatory action to be taken  
Administrative Order to be issued.

Enclosures:  
Lab Report No. \_\_\_\_\_  
Pictures \_\_\_\_\_  
Other \_\_\_\_\_

Investigated by:

*Laurence Ashley*  
Laurence Ashley  
Hazardous Waste Inspector

Name of Company or Individual: Chemical Processors, Inc. Pier 91 Facility

ENDORSEMENT

TO: SECTION HEAD

FROM: SUPERVISORS

We have taken the following action within the Region to resolve this problem:

The facility is working on updating Part A and Notification as to waste that the facility receives. They are also working on an updated Closure Plan.

\_\_\_\_\_  
Environmental Quality  
Supervisor

*John L. Lough*  
Hazardous Waste  
Supervisor

\_\_\_\_\_  
Resource Management  
Supervisor

TO: REGIONAL MANAGER

FROM: SECTION HEAD

Recommend enforcement action be taken as proposed.

*Stewart A. Messman* 6/27/86  
Section Head Date

RCRA PERMIT  
ADMINISTRATIVE RECORD  
ITEM NUMBER **192917**  
TOTAL NUMBER OF PAGES **22**

CHEMICAL PROCESSORS, INC

PIER 91 FACILITY

